

LAW OFFICES OF THOMAS K. CROWE, P.C.

1250 24th STREET, N.W.
SUITE 300
WASHINGTON, D.C. 20037

TELEPHONE (202) 263-3640
FAX (202) 263-3641
E-MAIL firm@tkcrowe.com

January 25, 2012

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

GRANTED

for 60 days
JAN 26 2012

COMPETITION POLICY DIVISION
WIRELINE COMPETITION BUREAU

William H. Dever

Re: Docket No. 12-18; Stanacard, LLC; Request for STA

Dear Ms. Dortch:

Stanacard, LLC ("Applicant"), pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, hereby respectfully requests Special Temporary Authority ("STA"), for a period of sixty (60) days, to continue providing service to customers pending the Federal Communications Commission's ("FCC's" or "Commission's") consideration and approval of an application for consent to transfer of control, which was filed on January 17, 2012 in the above referenced docket.

As detailed in the underlying transfer of control application, Michael Choupak ("Choupak") assigned half of his approximately 88.88% ownership interest in Applicant to Anastasia Koroleva ("Koroleva") on October 23, 2010. Since Choupak retained de facto control of the Applicant as its Manager, and the transfer was for less than a controlling interest, it was considered presumptively pro forma. On June 21, 2011, Choupak assigned the remainder of his approximately 44.44% ownership interest to Koroleva, resigned his role as the Applicant's Manager, and Koroleva was elected Manager in his place. Thus, effective as of June 21, 2011, control of the Applicant was transferred from Choupak to Koroleva. The underlying transactions were completely transparent and did not result in a reduction or impairment of service to any of Applicant's customers. However, Applicant and the parties to the transaction did not seek the Commission's consent prior to the transfer of control and are requesting this STA as part of a plan to correct any deficiency which may have resulted from this oversight.

Applicant, a Delaware limited liability company, is a reseller of (primarily international) prepaid telecommunications services. Grant of this STA is in the public interest as it will allow Applicant to continue providing uninterrupted telecommunications services to its customers. Applicant's target market consists of consumers that often have lower incomes and fewer options available for the purchase of telecommunications service than options which may be available to

Marlene H. Dortch
January 25, 2012
Page 2

the public at large. Discontinuance of the Applicant's service could result in a widespread loss of telecommunications services to end user customers, which rely on Applicant for cost-effective prepaid telecommunications services. Since Applicant provides telecommunications services on a prepaid basis, a service disruption may result in a situation in which customers cannot be made whole, even if refunds for lost service are available.

Applicant has taken steps to correct this deficiency by filing applications for Commission approval of the transfer of control as well as the instant request for STA. Applicant is working closely with communications counsel to ensure that this matter receives necessary attention. Applicant acknowledges that the grant of this STA extension will not prejudice any action the Commission may take on the underlying transfer of control application. Applicant further acknowledges that this STA can be revoked by the Commission upon its own motion without a hearing, and that grant of an STA and the underlying application will not preclude enforcement action.

Please contact the undersigned should you have any questions.

Sincerely,

/s/ Cheng-yi Liu,
Counsel for Stanacard, LLC

Enclosure

cc: Tracie Wilson (tracie.wilson@fcc.gov)
Jodie May (jodie.may@fcc.gov)
Dennis Johnson (dennis.johnson@fcc.gov)
Christopher Sova (christopher.sova@fcc.gov)